

EXHIBIT 4



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Via Email

Michael Wolin
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February 17, 2023

Re: *United States, et al., v. Google LLC*, No. 1:23-cv-108 (E.D. Va)

Dear Mr. Wolin:

I write in response to your letter dated February 3, 2023.

In response to your first inquiry, Google has taken reasonable steps to preserve information relevant to the above-referenced litigation. That is true with respect to former as well as current employees. Specifically, and without waiving any applicable privilege, Google issued a legal hold notice that instructs employees to retain all responsive information. For chats, employees were instructed not to use any third-party or Google messaging apps (including Google Chat) to discuss topics covered by the legal hold, and to ensure that if such messages are created that they are preserved by, for example, turning “history on.”

Further, although Google does not believe it is obligated to do so, out of an abundance of caution, Google implemented an additional process on February 8 whereby all Google Chats, regardless of the subject matter of the discussion, have been permanently set to “history on” and automatically preserved for Google employees whose documents and communications were placed on hold in connection with the ad tech investigation preceding this litigation for so long as that hold is in place.

Finally, regarding the United States and relevant plaintiff States’ document preservation obligations in the above-reference litigation, the United States and those plaintiff States have been obligated to properly preserve information relevant to the claims asserted since the outset of the investigation preceding this litigation. This obligation extends to, but is not limited to, any entity on behalf of which the United States seeks to recover damages under 15 U.S.C. § 15a as well as any other State or federal entity that has information relevant to the claims asserted. Please confirm that the United States and plaintiff States are doing so.

Sincerely,

A handwritten signature in black ink that reads "Eric Mahr".

Eric Mahr